

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION (KANSAS CITY)**

FREDERICK ESKRIDGE,
Plaintiff,

CASE NO.

vs.

JUDGE

CAPITAL ONE BANK USA, N.A.;
UNITED REVENUE CORP; AMERICAN
FIRST FINANCIAL; EXPERIAN
INFORMATION SOLUTIONS, INC.;
EQUIFAX INFORMATION SERVICES,
LLC; and TRANSUNION, LLC;
Defendants.

TRANS UNION, LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the 16th Associate Circuit Court of Jackson County, Missouri, to the United States District Court for the Western District of Missouri, on the following grounds:

1. Plaintiff Frederick Eskridge served Trans Union on or about March 24, 2017, with a Summons and Verified Petition filed in the 16th Associate Circuit Court, Jackson County, Missouri. Copies of the Summons and Petition are attached hereto as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Petition ¶¶ 80-89.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 16th Associate Circuit Court, Jackson County, Missouri, to the United States District Court for the Western District of Missouri.

5. As of the date of this Notice Of Removal, Defendants Equifax Information Services LLC (“Equifax”), Experian Information Solutions, Inc. (“Experian”), Capital One Bank USA, N.A. (“Capital One”), American First Finance, improperly named as American First Financial, (“American First”) and United Revenue Corp. (“United Revenue”) have been served. Counsel for Trans Union has contacted representatives for Equifax, Experian, Capital One, American First and United Revenue Corp. and they have consented to this removal as evidenced by the consents attached hereto as **Exhibit C**, **Exhibit D**, **Exhibit E**, **Exhibit F**, and **Exhibit G**, respectively.

6. Notice of this removal will promptly be filed with the 16th Associate Circuit Court, Jackson County, Missouri and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 16th Associate Circuit Court, Jackson County, Missouri, to this United States District Court, Western District of Missouri.

Respectfully submitted,

s/ Todd A. Lubben

Todd A. Lubben, Esq. (MO #54746)

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Counsel for Defendant, Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **17th day of April, 2017**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **17th day of April, 2017**, properly addressed as follows:

<u>for Plaintiff Frederick Eskridge</u> Mark D. Molner, Esq. T. Ryan Merrigan, Esq. Molner/Merrigan, LC 111 W. 10 th Street Kansas City, MO 64105	
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s/ Todd A. Lubben

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